

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

**United States District Court
For The District Of Maryland 2012 JUN 29 PM 2:54**

CLERK'S OFFICE
AT BALTIMORE

BY _____ DEPUTY

Everton Brown.	*	
7542 Maury Road	*	
Baltimore, Maryland 21244	*	WDQ12 CV1954
Phone: 410-298-4327	*	
 Plaintiff.	*	
 V.	*	
U.S. Department of Justice.	*	
Eric Holder Attorney General	*	
950 Pennsylvania Avenue, NW	*	
Washington, DC 20530	*	
 Defendant.	*	

* * * * *

Complaint For Injunctive Relief

- 1.** This is an action under the Freedom of Information Privacy Act, 5 U.S.C. ? 552, to order the production of agency records, concerning the five years plaintiff have been targeted, which defendant has improperly withheld from plaintiff.
- 2.** This court has jurisdiction over this action pursuant to 5 U.S.C. ? 552(a)(4)(B)
- 3.** Plaintiff, Everton Brown is the requestor of the records which defendant

is now withholding. Plaintiff has requested this information for personal Needs. Prompt release of the information is essential to end the unwarranted continuous terror that is invoked into plaintiff existence.

(1) Plaintiff, was stalked by residence in a neighborhood where plaintiff was rehabbing a house. After numerous complaint to the police these Individuals attempted to take plaintiff life by gun fire.

Plaintiff communicated with 911 over half hour before this incident occurred but plaintiff was unable to receive police assistance for several hours.

Plaintiff, did capture a picture of the vehicle tag in this incident but the case have been closed by the police, stating victim could not identify perpetrators vehicle.

(2) New neighbors, in a house connected to Plaintiff Home threatened plaintiff's life with a knife after plaintiff confronted neighbor, referencing a police reported incident involving the new neighbors. These Neighbors cut through walls of Plaintiff's Home. Plaintiff filed charges in this incident, prosecutors closed case without a trial.

(3) Plaintiff have experienced uncountable amount of problem related to possessing illegal items without cause.

(4) The FBI have monitored plaintiff Home, Vehicle, public transactions, employment, plaintiff's electronic communication, by Aircraft, Automobile, personnel, general public, Searching, vandalizing, removing items of benefit to evade connection to the unlawful daily acts of abuse of power and resources without cause at Tax Payers expense.

204

(5) Plaintiff's, Mothers home is searched on a daily basis who resides at 4117 Mountwood Road, Baltimore, Maryland, 21229 without cause.

(6) Plaintiff have never been associated, connected, involved in any form of illegal activates or conspiracy of any kind and is unjustly targeted. This total destruction by the FBI of hopes, dreams, ambition, motivation by suppressing the fundamental values and foundation of this grate nation which is every American's God given Right and should not be tolerated.

4. Defendant Federal Bureau of Investigation is an agency of the United States and has possession of the document that plaintiff seeks

5. By letter dated March 16,2012 plaintiff requested access to records of investigation. A copy of this letter is attached as Exhibit 1.

6. By letter dated March 29, 2012 plaintiff was denied access to the requested information on the grounds that information does not exist.

7. By letter dated April 5, 2012 plaintiff appealed the denial of this request. A copy of this letter is attached as Exhibit 3.

8. By letter dated June 5, 2012 plaintiff's appeal was denied . A copy of this letter is attached as Exhibit 4.

9. Plaintiff has a right of access to the requested information under 5 U.S.C. ? 522(a)(3) and there is no legal basis for defendant denial of such access.

Wherefore, plaintiff request this Court:

- (1) Order defendant to provide access to the requested documents;
- (2) Expedite this proceeding as provided for in 20 U.S.C. ? 1657;

- (3) Award plaintiff costs and reasonable attorney fees in this action, as provided in 5 U.S.C. ? 552 (a)(4)(E); and
- (4) Grant such other and further relief as deem just and proper.

Respectfully Submitted,

Everton Brown

Everton Brown
7542 Maury Road
Baltimore, Maryland 21244
Phone: 410-298-4327